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FW: Letter from Nat'l Marine Manufacturers Assoc. re: E15 waivers
To: CMS.OEX@epamail.epa.gov

From: Michael Pasko [mailto:mpasko@nmma.org]
Sent: Friday, September 01, 2017 1:11 PM
To: Pruitt, Scott <Pruitt.Scott@epa.gov>
Subject: Letter from Nat'l Marine Manufacturers Assoc. re: E15 waivers

Please see the attached letter from the National Marine Manufacturers Association in response to the recent E15 waivers. Thank you.

-Mike Pasko

Michael R. Pasko
Director, Federal Government Affairs
National Marine Manufacturers Association (NMMA)

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September 1, 2017

The Honorable Scott Pruitt
Environmental Protection Agency
Office of the Administrator – 1101A
1200 Pennsylvania Ave., NW
Washington, DC 20460

Submitted electronically

Administrator Pruitt:

Your waivers on August 30th and August 31st allowing for the sale of E15 in nearly two thirds of the country puts our nation's 142 million boaters at significant risk. E15 severely damages marine engines, creating real danger for boaters and the American public. To ensure Americans are protected, EPA must immediately and effectively educate the public about the proper use of E15.

NMMA is the leading recreational marine industry trade association in North America, representing 1,400 boat, engine, and accessory manufacturers. NMMA members collectively produce more than 80 percent of the recreational marine products sold in the United States. Recreational boating is a significant driver of the country's economy, employing 650,000 people across more than 34,000 boating businesses, while contributing \$121.5 billion in economic activity.

We are very cognizant of the fact Hurricane Harvey has caused widespread devastation throughout Texas and the Gulf region and that many oil refineries have been shut down. While the flood waters are still receding, we have already started to receive reports of widespread and severe damage to marinas, boat ramps, and other boating access points. Our industry has stood with fellow Americans to assist those in need. Numerous marine manufacturers, dealers and hundreds of boaters have provided boats, and engines to assist with rescue and recovery efforts.

Like many throughout our country, we have watched and read about harrowing rescues of people from flooded communities. More often than not, these rescues are being done via boat. This is why your recent waivers allowing for the expanded sale of E15—including in Texas and Louisiana—are especially troubling. The very boats being used in rescue and recovery missions are now at risk for severe damage by users unknowingly filling them with E15, putting these boaters in harm's way.

We call on EPA to fulfill its obligation and commit to a comprehensive Misfueling Mitigation Plan (MMP). The current MMP is inadequate, and requires only a small warning label that oftentimes isn't even present at gas pumps. EPA must do more robust outreach and education to ensure public safety.

Public polling has consistently indicated that consumers do not know about the impacts of E15 in small engines. A 2016 Harris Poll found that only 31 percent of Americans understand that higher blends of ethanol can be harmful to small engines¹. Even more troubling, 60 percent of Americans assume that any gas sold at a gas station must be safe for all engines.

In years past, EPA has led the way to ensure the public is aware about changes to their fuel supply. During the 1970s, as the country transitioned to unleaded fuels, EPA spearheaded a combination of educational initiatives that went far beyond a small pump label. The further proliferation of E15 is akin to the introduction of unleaded gasoline and merits greater government-led public awareness efforts.

Overall, the current MMP is lacking and ineffective. Fuel pump labeling should not be the sole consumer outreach method. Recent research has indicated that while 92 percent of consumers notice the price at a pump, only 50 percent notice warning labels and just 24 percent notice ethanol content². At a minimum, fuel pump labeling should be held in conjunction with broader outreach campaigns, as was the original intent of the EPA.

Additionally, NMMA supports the implementation of physical applications that prevent misfueling, such as nozzle size differentials. Physical applications would significantly reduce the risk of misfueling, and reduce retailer liability.

Beginning in 2011, EPA instructed stakeholders to “develop a broad public education and outreach campaign that provides both consumers and retailers with the information they need to avoid misfueling.” NMMA heeded this request, working with other stakeholder groups to develop and promote educational outreach efforts. Notably the “Look Before You Pump” campaign, conducted in partnership with the Outdoor Power Equipment Institute, and through distribution of “No E15” labels to recreational boat and engine manufacturers. NMMA has also educated its member companies and worked with industry partners to raise consumer awareness. We have partnered with safety/certification organizations, state boating associations and national groups like BoatU.S. and the American Sportfishing Association.

But more must be done and EPA must do their part. Americans need to trust the EPA will keep them safe.

EPA’s failure to develop a true MMP will lead to unintended and potentially dangerous, consequences. In studies and testing conducted in partnership with the federal government, and which our organization has previously provided to EPA, E15 and other higher blends of ethanol have caused significant engine damage in marine engines. Emissions and durability testing have compared E15 and E0, and examined exhaust emissions, exhaust gas temperature, torque, power, fuel flow and engine performance. Specifically, the testing showed degraded emissions performance outside of engine certification limits as well as increased fuel consumption³. In

¹ <http://opei.org/new-nationwide-poll-finds-increased-mis-fueling-of-engines-despite-awareness-of-ethanol-in-gasoline/>

² <http://opei.org/new-opei-survey-shows-education-sorely-lacking-on-higher-ethanol-fuel-blends/>

³ <https://www.nmma.org/assets/cabinets/Cabinet515/Volvo%20Penta%20engines%20and%20E15%20NREL%20Report.pdf>

separate testing on engine durability, each tested engine showed deterioration, including two of the three outboard engines with damages severe enough to prevent them from completing the test cycle⁴. EPA understands this, as evidenced by the current prohibition on E15 in marine engines. However, further outreach to the public is needed by EPA so that consumers understand the differences at the gas pump.

NMMA calls on the EPA to adhere to their pledge to work with all parties to develop an effective MMP, and we stand ready to serve as a partner in this endeavor.

Please do not hesitate to contact me if we can help you or your staff better understand the need for a more comprehensive MMP. If your staff have further questions, they can also feel free to contact Mike Pasko (NMMA's Director of Federal Government Affairs), at mpasko@nmma.org or 202-737-9760.

Sincerely,



Thom Dammrich
President
National Marine Manufacturers Association

CC:

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⁴<https://www.nmma.org/assets/cabinets/Cabinet515/Mercury%20Engines%20and%20E15%20NREL%20Report.pdf>